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April 17, 2019

via Electronic Filing

Honorable Pamela K. Chen
Judge, District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

RE: United States v. Jose Hawilla, Traffic Sports USA Inc., and Traffic Sports
International Inc.
Docket No.: 14-CR-609 (PKC)

Dear Judge Chen:

I am submitting this letter memorandum to supplement the victim statement previously filed on behalf of Innovative Sports Marketing.

While the defendants in this matter were not charged specifically with paying a bribe for rights to distribute CCTV for the Olympic Qualifying Tournament, it has been well established that Traffic's business practices involved widespread bribery for these types of rights. In a New York Times article of October 20, 2016 by Rebecca R. Ruiz about the guilty plea of Aaron Davidson, who negotiated and paid many of the bribes on behalf of Traffic, he is described as explaining that "those bribes helped Traffic secure lucrative media and marketing contracts, including rights to major international tournaments."

There is little doubt that the investigators and prosecutors have evidence that a bribe was paid to secure CCTV rights to the Olympic Qualifying Tournament for which Innovative Sports Marketing had been assured that it was going to receive the contract for both CCTV and PPV. Moreover, as explained by Doug Jacobs in his Victim Statement, awarding the contract to Traffic despite failure of the Traffic distribution to include residential English-language distribution via PPV, contrary to the wishes of the

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U.S. Soccer Federation, can only be explained by a bribe to Chuck Blazer. A copy of the email from Clive Toye, an executive in the CONCACAF office, assuring Doug that Innovative Sports Marketing would be receiving the contract, is attached.

Doug is attempting to reach the following people who presumably have information regarding the bribes paid by Traffic USA to Chuck Blazer for the Concacaf Olympic Qualifiers. He is hopeful of securing a corroborating statement from one or more of them after Fabio Tordin is sentenced in May.

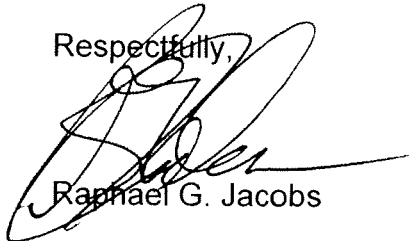
Fabio Tordin - Fabio was CEO of Traffic Sports during this time frame and also was involved in Circuito Cerrado which was the Closed Circuit/PPV distribution arm for Traffic Sports. Circuito Cerrado distributed the Olympic Qualifiers on CCTV. Fabio is being sentenced on May 19th.

Enrique Sanz - Enrique also worked for Traffic Sports during this time period and may be aware of bribes paid to Blazer

Claudia Cortes - Claudia was a long-time employee of Circuito Cerrado and she would have knowledge of any payments made to Blazer in exchange for rights.

I will appear at the June 13th hearing with Doug Jacobs; he is prepared to testify if the court permits.

Respectfully,

A handwritten signature in black ink, appearing to read 'R. Jacobs', is written over the word 'Respectfully,'.

Raphael G. Jacobs

RGJ/tp

Encl.

cc: Mr. Samuel Nitze (USANYE), via email

Mr. Douglas Jacobs (ISM), via email

From: CliveToye@aol.com [<mailto:CliveToye@aol.com>]
Sent: Thursday, October 16, 2003 8:09 AM
To: doug@ppvsports.com
Subject: Olympics

You shd be getting confirmation that you're getting the Olympics; waiting for the final say-so from Chuck